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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE DESHAWN WILLIAMS,

Defendant.

Case:3:21-cr-20144
Judge: Cleland, Robert H.
MJ: Stafford, Elizabeth A.
Filed: 03-03-2021 At 04:12 PM
INDI USA V ANDRE DESHAWN WILLIAMS (LG)

18 U.S.C. § 2252A(a)(2)(A)

18 U.S.C. § 2252A(a)(5)(B)

18 U.S.C. § 2253

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. § 2252A(a)(2)(A)

Distribution of Child Pornography

From on or about April 16, 2020, to on or about April 21, 2020, in the Eastern District of Michigan, and elsewhere, the defendant, ANDRE DESHAWN WILLIAMS, did knowingly distribute child pornography as defined in 18 U.S.C. § 2256(8); and the images distributed by the defendant had been mailed, shipped, and transported using the Internet, a means and facility of interstate or foreign commerce, and had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT TWO

18 U.S.C. § 2252A(a)(2)(A)

Receipt of Child Pornography

Between the dates of April 1, 2020 and September 22, 2020, in the Eastern District of Michigan, and elsewhere, the defendant, ANDRE DESHAWN WILLIAMS, did knowingly receive child pornography as defined in 18 U.S.C. § 2256(8); and the images received by the defendant had been mailed, shipped, and transported using the Internet, a means and facility of interstate or foreign commerce, and had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT THREE

18 U.S.C. § 2252A(a)(5)(B)

Possession of Child Pornography

Between the dates of April 1, 2020 and September 22, 2020, within the Eastern District of Michigan, the defendant, ANDRE DESHAWN WILLIAMS, knowingly possessed one or more computer hard drives, cell phones, cameras, DVDs, magazines, periodicals, and other material which contained child pornography, as defined in Title 18, United States Code, Section 2256(8), and that child pornography had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and/or transported in and affecting interstate and foreign commerce, and was produced using materials that

have been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including computer, and any of those images of child pornography involved a prepubescent minor and a minor who had not attained 12 years of age, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

1. The allegations of this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253 and Title 18, United States Code, Section 2428.

2. If convicted of an offense charged and set forth above, ANDRE DESHAWN WILLIAMS, shall forfeit to the United States any and all materials and property used and intended to be used in the production, receipt, and possession of visual depictions of minors engaging in sexually explicit conduct,

[Space left intentionally blank.]

and any and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

MATTHEW A. ROTH
Chief, Major Crimes Unit
Assistant United States Attorney

s/Diane N. Princ
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Dated: March 3, 2021

United States District Court
Eastern District of Michigan

Criminal Case Cover S

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it :

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: DNP

Case Title: USA v. ANDRE DESHAWN WILLIAMS

County where offense occurred : Wayne

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 20-mj-30447]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 3, 2021

Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.